



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Philip E. Batt, Governor

April 29, 1998

CERTIFIED MAIL #P 102 109 626

Larry Peak, General Manager
Interstate Concrete & Asphalt
P.O. Box 1113
Sandpoint, Idaho 83864

RE: Non-Substantive Modification of Tier II Operating Permit #017-00048
Interstate Concrete & Asphalt (Sandpoint)

Dear Mr. Peak:

On January 16, 1998, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a letter from Interstate Concrete & Asphalt (Interstate) requesting a modification of the Tier II Operating Permit (OP). On February 18, 1998, the request was declared complete.

Based on review of your application, state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Therefore, please find enclosed your modified Tier II OP (#017-00048) for the emission sources that exist at the facility. The enclosed pages supersede the original pages in your permit. Please replace those pages with those enclosed.

Although the modified permit does not explicitly specify the required frequency of dust suppressant applications, it is anticipated that Interstate shall not reduce the effectiveness of fugitive dust control from the unpaved road and traffic areas. The evaluation of your facility's ambient air quality impact in the 1995 Sandpoint Nonattainment Area PM₁₀ State Implementation Plan specifically included Interstate's proposed fugitive dust control measures. This information was formally provided by Interstate to DEQ in the form of the "Fugitive Dust Control Plan," dated May 2, 1995. The Environmental Protection Agency (EPA) - Region X has not formally approved the control plan implemented with the 1995 Sandpoint PM₁₀ SIP at this time. DEQ is tasked with maintaining the level of PM₁₀ emission control adopted and used in the SIP attainment demonstration.

DEQ realizes that Interstate understands the best way to incorporate the fugitive dust control requirements at the Sandpoint facility. Thus, the permit requirement for application of the chemical dust suppressant has been altered to an "as necessary" basis, as requested. The burden of maintaining a ground application inventory of dust suppressants is now Interstate's responsibility. The frequency and application intensity of the chemical dust suppressant must match the conditions afforded by existing ground inventory, weather, and facility traffic conditions. The request for subsequent watering on a weekly basis was not incorporated because more frequent watering may be required, depending on existing chemical dust suppressant inventory, moisture content, weather conditions, and vehicle traffic. Permit conditions to monitor and record the fugitive dust control activities for paved areas have been added (see Conditions 4.3 and 5.2.1 on pages 9 and 10 of 14).

Interstate must submit a modified version of the "Fugitive Dust Control Plan" (referred to as the Chemical Dust Suppressant Application Plan in the Tier II OP) reflecting the alterations to the permit's fugitive dust control methods. The revised document must be submitted to DEQ, and a valid current copy must be maintained on-site. Please submit the revised Fugitive Dust Control Plan to DEQ within 14 days of receipt of this letter.

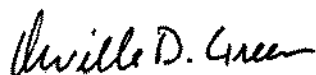
Please bear in mind that performance of recordkeeping of fugitive dust control actions is required by your Tier II OP. Interstate did not perform recordkeeping, as required by the facility's Tier II OP as revealed during a September 4, 1997, inspection by Tom Harman, DEQ Coeur d'Alene Regional Office, and Jim Greaves, EPA, Idaho Operations Office. Failure to perform recordkeeping may be considered a violation of the permit and does not provide DEQ with any way to verify that Interstate has performed the aggressive level of fugitive dust control that was originally proposed by Interstate. The emission controls proposed by Interstate were incorporated in the attainment demonstration modeling to allow Interstate the operational flexibility that the company requested during the SIP process and became part of the permit as "Conditional Control Measures" to be incorporated by July 1, 1996. The fugitive dust control efficiency afforded to Interstate requires control efforts which are more intensive than that required to achieve the "reasonable" level of control. Reasonable control of fugitive dust is the level required of all facilities operating in Idaho, per IDAPA 16.01.01.650.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within 35 days of the date of this decision.

This Tier II OP action is not subject to permit application fees of five hundred dollars (\$500.00) in accordance with IDAPA 16.01.01.470.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Susan J. Richards, Chief, Air Quality Permitting Bureau, at (208) 373-0502.

Sincerely,



Orville D. Green
Assistant Administrator
Air & Hazardous Waste

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Enclosure: Modified Permit Pages

cc: Coeur d'Alene Regional Office
P. Payne/AFS
Source File
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AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Interstate Concrete & Asphalt
Asphalt Batch Plant and Concrete Batch Plant
Sandpoint, Idaho

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Emission Sources

1. SOURCE DESCRIPTION

1.1 Process Description

This section of the permit includes fugitive emission sources. Sources of fugitive emissions include vehicle traffic on paved and unpaved roads, aggregate handling, and stockpile erosion. Various sized aggregates are delivered by truck to the stockpile area. Conveyors deliver sized aggregate to three (3) overhead bins at the top of the concrete plant. Related to asphalt production, a front-end loader transfers aggregate as needed to a four-bin cold feed hopper. Metered quantities of aggregate are fed from the hopper onto two (2) open conveyors in series and delivered to a natural gas-fired drum dryer. Stockpiled sand and gravel are then loaded out into vehicles of various configuration either from the PG Hopper or a front-end loader. Several of these sources have been discussed in previous sections.

1.2 Proposed Conditional Control Measures for Vehicle Traffic

The Permittee shall increase the control measures on unpaved roads and areas and sweep (water flushing as necessary) all paved roads at least weekly.

The Permittee shall pave the proposed access roads and scale area.

2. EMISSION LIMITS

2.1 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 16.01.01.650 and 808.

2.1.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) as needed. The ESCDS shall be applied in sufficient quantities and frequency so as to provide reasonable control of fugitive dust from the unpaved haul roads and front-end loader travel areas. Water shall be applied to the unpaved traffic areas following the ESCDS applications in the amounts and frequency necessary to control fugitive dust emissions.

2.1.2 Vehicle Traffic Emissions Proposed Control for Conditional Control Measures

The Permittee shall increase fugitive PM₁₀ control strategies according to the methods submitted to the Department in the following document: "Fugitive Dust Control Plan", Interstate Concrete & Asphalt Company, Sandpoint, Idaho, May 2, 1995.

3. OPERATING REQUIREMENTS

3.1 Installation of Proposed Conditional Control Measures

The Permittee shall, by no later than July 1, 1996, install the Conditional Control Measures, as described in Section 1.2 of this permit.

ISSUED: April 29, 1998
EXPIRES: July 7, 2000

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Fugitive Emission Sources

4. MONITORING REQUIREMENTS

4.1 Chemical Dust Suppressant Application Plan

4.1.1 The Permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP).

4.1.1.1 Brand name and chemical composition of the ESCDS selected for use.

4.1.1.2 Dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.

4.1.1.3 Application intensity, in gallons per square yard (gal/yd²), of the ESCDS solution for each projected treatment date.

4.1.1.4 Facility plot plan illustrating the proposed treatment areas.

4.2 ESCDs Application Log

The Permittee shall record the following information each time the ESCDS is applied:

4.2.1 Brand name and chemical composition of the ESCDS used.

4.2.2 Dilution ratio (volume of water: volume of ESCDS) used to form the ESCDS solution ready for direct application.

4.2.3 Date of ESCDS solution application.

4.2.4 Application intensity (gal/yd²) of the ESCDS solution.

4.2.5 Facility plot plan illustrating the treated areas.

4.2.6 Name of the firm and of the operator responsible for the ESCDS solution application. The operator shall initial these required records to verify their accuracy.

4.3. Paved Road Control Measures Log

The Permittee shall record in a log the following information:

4.3.1 The date the paved traffic areas are swept (or broomed).

4.3.2 The date the paved traffic areas are flushed with water.

4.3.3 Name of the firm and of the operator responsible for the housekeeping activities listed in Conditions 4.3.1, and/or 4.3.2.

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Fugitive Emission Sources

5. REPORTING REQUIREMENTS

5.1 Chemical Dust Suppressant Application Plan.

5.1.1 A copy of the CDSAP shall be made available to Department representatives upon request.

5.1.2 The Permittee shall notify the Department in writing of any changes in an existing CDSAP at least thirty (30) days prior to the proposed date of change.

5.2 ESCDS Application Log

5.2.1 A copy of the ESCDS Application Log and Paved Road Control Log shall be maintained on-site for the most recent two (2) year period.

5.2.2 Access to these records shall be made available to Department representatives upon request.

5.3 The Permittee shall provide notice to the Department within ten (10) days of making the change, as described in Section 1.2 of this permit.


ISSUED: April 29, 1998
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